

19 CV 02142

JUDGE SWAIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEK SECURITIES CORPORATION and
ROX SYSTEMS, INC.

Case No.: _____

Plaintiffs, :

- against -

NICOLAS LOUIS, JONATHAN FOWLER, VOLANT
HOLDING, LLC d/b/a VOLANT TRADING, VOLANT
TRADING, LLC, VOLANT LIQUIDITY, LLC, AND
VOLANT EXECUTION, LLC

Defendants. :

x

DECLARATION OF CHRISTINA S. DUMITRESCU

I, CHRISTINA S. DUMITRESCU, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct:

1. I am an attorney admitted to practice law in the United States District Court for the Southern District of New York. I am an associate with the law firm Dentons US LLP, counsel for plaintiffs Lek Securities Corporation (“LSC”) and ROX Systems, Inc. (“ROX Systems” and, together with LSC, “Plaintiffs”). I make this declaration to place the proposed expedited discovery in the afore-mentioned matter before this Court.

2. Attached hereto as Exhibit A are true and correct copies of Plaintiffs’ proposed Notices of Rule 30(b)(6) Deposition, dated March 8, 2019, for Defendants Volant Holding, LLC d/b/a Volant Trading (“Volant Holding”), Volant Trading, LLC (“Volant Trading”), Volant Liquidity, LLC (“Volant Liquidity”), and Volant Execution, LLC (“Volant Execution”) (together, the “Volant Defendants”).

3. Attached hereto as Exhibit B are true and correct copies of Plaintiffs' proposed Notices of Deposition, dated March 8, 2019, to Defendant Nicolas Louis ("Louis") and Defendant Jonathan Fowler ("Fowler").

4. Attached hereto as Exhibit C are true and correct copies of Plaintiffs' [Proposed] First Set of Limited, Expedited Document Requests to the Volant Defendants, Louis, and Fowler.

5. Attached hereto as Exhibit D are true and correct copies of Plaintiffs' [Proposed] First Set of Limited, Expedited Interrogatories to the Volant Defendants, Louis, and Fowler.

6. On March 7, 2019, co-counsel notified Defendants of Plaintiffs' pending TRO application.

Dated: New York, New York
March 7, 2019


CHRISTINA S. DUMITRESCU

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